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**AFFIDAVIT**

I, Kelly Liberti, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Cleveland Division, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI for more than 17 years, and am currently assigned to the Cleveland Division's Elyria Resident Agency. While employed by the FBI, I have assisted in the investigation of federal criminal violations related to Internet fraud, computer intrusions, crimes against children, violent crime and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. This affidavit is being submitted for the limited purpose of establishing probable cause that Jeremy Mack (MACK) and Ashley Onysko (ONYSKO), knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, or maintain by any means a person, (1) knowing or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act; and (2) knowing, or in reckless disregard of the fact, that the person has not obtained the age of eighteen years and will be caused to engage in a commercial sex act, all in violation of 18 U.S.C. § 1591(a)(1).

4. As such, this affidavit does not include every fact known to me regarding this investigation, but will rather seek to summarize the relevant information concerning this investigation. The statements in this affidavit are based in part on information provided by

Detective Michael Groomes and Sergeant James Welsh, of the Elyria Police Department (EPD), and on my investigation of this matter.

5. On April 9, 2013, EPD's Special Response Team and Narcotics Officers executed a search warrant at 8 Tattersal Court, Elyria, Ohio. Officers arrested MACK and ONYSKO in front of 8 Tattersal Court, in connection with the search warrant and surrounding investigation.

6. EPD had previous knowledge that MACK was involved in the distribution of narcotics and prostitution. EPD arrested MACK and charged him with trafficking in heroin and compelling and promoting prostitution. EPD arrested ONYSKO and charged her with possession of heroin, permitting drug use, and compelling and promoting prostitution. EPD discovered a Ramada Inn key card on ONYSKO's person during a search incident to arrest. EPD responded to the Ramada Inn for a well-being check and located a 19-year-old female in the hotel room. The female stated she was being held by MACK and forced to prostitute herself to pay off a drug debt. This female described ONYSKO as MACK's business partner in the prostitution business.

7. Officers confiscated condoms, heroin paraphernalia including syringes, an HP laptop, a blue daily planner and a black spiral notebook from the hotel room.

8. Two cell phones were confiscated from ONYSKO's person, one of which subscribed to telephone number 440-320-6022.

9. On April 9, 2013, ONYSKO was voluntarily interviewed by EPD officers. ONYSKO told the officers she worked for MACK facilitating meetings for sex between girls (escorts) and men (clients). ONYSKO stated she posted advertisements for "escort services" on websites such as "Backpage.com" and used her cellular phone, 440-320-6022, as the point of contact for those ads. ONYSKO said when clients called she claimed to be a friend of the girl in

the ad and arranged the appointment. ONYSKO directed the clients on where to meet the escorts and quoted prices of \$120 for a half hour and \$220 for an hour.

10. ONYSKO reserved hotel rooms in her name for the escorts and paid for those rooms with a credit card provided to her by MACK. ONYSKO also stated she was responsible for feeding the escorts. ONYSKO was paid 30% from each transaction between one of the girls and a client. ONYSKO identified the blue daily planner and black notebook confiscated from the hotel room and told officers her hand written entries were present in both. ONYSKO said both items were used for the purpose of tracking the girls' money and time spent with clients. Affiant has reviewed both the blue binder and the black notebook, and found that numerous females were listed with corresponding appointment dates, earnings, customer names, and earnings to be applied to the girls' heroin debt. ONYSKO and MACK's percentages were totaled for each appointment and a notation made for how much money was going toward each girl's debt to MACK.

11. ONYSKO was asked about the two bags on heroin found on her person and she stated she provided the heroin to the escorts to prevent them from becoming horribly ill. ONYSKO admitted that by providing the heroin, the escorts were able to function and meet clients, ensuring ONYSKO could continue earning her 30% share.

12. Investigation revealed MACK and ONYSKO were using Internet sites, such as "Backpage.com" and "Craigslist.com" to advertise the females. On Backpage.com, the women were advertised under the headings of "Cleveland Adult Entertainment/Escorts" or "Cleveland Adult Entertainment/Body Rubs". The ads included photographs of the woman posing against a wall or on a bed in only a bra and underwear or a negligee. All the ads listed the telephone number 440-320-6022 as the number to call to set up an appointment.

13. On April 19, 2013, your Affiant served a federal grand jury subpoena to Backpage.com for information on postings utilizing the telephone number 440-320-6022. On 4/22/2013, Backpage.com complied and produced ads utilizing telephone number 440-320-6022, that were purchased by MACK. Backpage.com invoice records showed MACK purchased ads for 10 different females from December, 2012 through April, 2013. The women were advertised as "Brittany", "Exotic Royal", "Maria", "Sable", "Big Booty", "Cierra", "Jane", "Bella", "Anna", "Jade", "Cloe", and "Sunni". The following is a representative sample of the ads posted by MACK:

"Exotic Royal – 20: Brittany, age 19, brown eyes, 5'5, 135 pounds, black hair, exotic private dance and private massage, fetishes welcome"

"Sexy Cierra is waiting for you...-19: I cater to fetishes, domination, role-playing, private dancing, massages, whatever your desire... call now and allow me to take you to the heights of ecstasy.

"Sunni, here for you-18: I have many great talents and a wild personality. I'm very open minded and into trying new things...if you love to be around a beautiful girl who can show you a great time that you'll never forget, then you found her!"

14. On several dates in April and May, 2013, your Affiant interviewed two of the escorts mentioned above. Jane Doe #1 was identified as a 19 year old female and Jane Doe #2 was identified as a 16 year old female (date of birth XX/XX/1996).

Jane Doe #1

15. Jane Doe #1 stated she began buying heroin from MACK in early 2013. MACK picked up Jane Doe #1 at her residence and drove her to his residence at 8 Tattersal Court, Elyria, Ohio to buy and use drugs. When Jane Doe #1 did not have enough money for heroin, Mack

offered to have sex with Jane Doe #1 in exchange for heroin. MACK began fronting heroin to Jane Doe #1 and her drug debt became too high for her to pay. MACK told Jane Doe #1 about his prostitution business. Within weeks, MACK told Jane Joe #1 that this is how she would work off her debt and refused to take her home. Jane Doe #1 said several girls were living at this residence and working for MACK as prostitutes. Jane Doe #1 said the girls were all attempting to pay off a drug debt to MACK. Jane Doe #1 was addicted to heroin and was forced to rely on MACK for her daily heroin to avoid going through painful withdrawal.

16. MACK took Jane Doe #1's cell phone from her shortly after her arrival at the house, and supervised all telephone calls. MACK gave Jane Doe #1 specific instructions on what she was allowed to say on the phone. MACK supervised all phone calls to Jane Doe #1's family and later required her to use an unregistered prepaid cell phone.

17. According to Jane Doe #1, ONYSKO lived at the Tattersal house and worked for MACK. ONYSKO took pictures of Jane Doe #1 and posted them on the Internet. Jane Doe #1 said MACK and ONYSKO used an HP laptop to store photos and create Internet ads for the prostitution business. Jane Doe #1 began seeing approximately three to ten clients a day and charged to engage in sexual acts with them. Jane Doe #1 said MACK provided her with condoms and wipes for each appointment. She was driven to a hotel by ONYSKO, MACK or another escort for each appointment and driven back to the Tattersal residence afterward. Jane Doe #1 was not allowed to keep any of the money she received from her clients, and had to turn it over to MACK immediately.

18. Jane Doe #1 was not allowed to have any money or purchase any items for herself. Jane Doe #1 stated that if she kept any money, she believed MACK would "beat the living crap out of me." MACK purchased all her clothes, makeup, food, cigarettes, drugs and

condoms. Jane Doe #1 cooked and cleaned for MACK and was not allowed be alone in the Tattersal house.

19. Jane Doe #1 was afraid of MACK and described him as violent. MACK told Jane Doe #1 that he served seven years in prison and was released in 2012. Jane Doe #1 witnessed MACK push other girls around, hit the other girls, and in one instance held a girl by her neck against a wall choking her. MACK hit Jane Doe #1 in the face on one occasion when a family member came to Elyria looking for her. Jane Doe #1 said MACK had several guns at the house and carried a black handgun in the back of his pants and waived it around when he was angry. MACK also carried a stun gun. Jane Doe #1 described MACK as having a terrible temper and he frequently made statements such as: "don't get me wrong, I'm not afraid to kill a bitch", and that he " would chop up and dispose of a bitch".

20. Jane Doe #1 said MACK sold large quantities of cocaine and heroin on a daily basis. On at least five occasions, MACK believed Jane Doe #1, along with other girls in the house, stole drugs from him. On these occasions, MACK instructed his eighteen-year-old son to keep an eye on the girls while he got his gun, then returned with the gun and strip searched and cavity searched all the girls. Jane Doe #1 said this typically happened when MACK misplaced drugs. Jane Doe #1 was cavity searched by MACK at least five times.

21. Jane Doe #1 said MACK liked to put girls in debt to him for drugs. Jane Doe #1 said MACK started by giving girls drugs for free. He then had sex with them for drugs, and then informed them that they were in debt to him for the drugs. When the girls could not pay, he fronted them the drugs and stated, "they'll be working for me within a week." MACK often told Jane Doe #1, "you girls are so easy" or "I got another one under my belt."

22. Jane Doe #1 said she was afraid to attempt to leave the Tattersal house because MACK knew where she lived and where her family lived. She was afraid MACK would hurt her or her family if she tried to leave. Jane Doe #1 said she was still indebted to MACK upon his arrest as he never subtracted her earnings from her drug debt.

Jane Doe #2

23. Jane Doe #2 began purchasing cocaine from MACK at MACK's Tattersal residence in March, 2013. Jane Doe #2 met MACK through MACK's eighteen-year-old son. During Jane Doe #2's first visit to Tattersal, MACK provided Jane Doe #2 with free drugs and had sexual intercourse with Jane Doe #2. MACK told Jane Doe #2 he knew she was 16 or 17 years old, but did not want to discuss it. The following day, ONYSKO told Jane Doe #2 all the girls at the house (Tattersal) were working as prostitutes for MACK to work off their drug debts. ONYSKO told Jane Doe #2, "You'll end up doing it. You don't think so, but you will."

24. For approximately the next two weeks, Jane Doe #2 went to MACK on a daily basis after school and on weekends. Jane Doe #2 noticed that the other girls were afraid of MACK and did not seem allowed to leave the house except to meet clients. Jane Doe #2 learned from one of the girls that MACK had hit a couple of the girls. Jane Doe #2 witnessed MACK with a gun and on one occasion she witnessed MACK chase three males down the street with his gun. Jane Doe #2 said MACK was mean, had a terrible temper and screamed at all the girls.

25. On March 29, 2013, MACK instructed Jane Doe #2 to get fixed up and instructed the other girls to take photographs of Jane Doe #2 for Backpage.com. Jane Doe #2 said she did not want to prostitute, but did it because MACK was "a guy with a gun who knew where I lived." ONYSKO wrote an ad and posted Jane Doe #2's picture at approximately 1:00-2:00 am. Within hours, ONYSKO received the first call for Jane Doe #2. ONYSKO arranged the



appointment and provided Jane Doe #2 with condoms. ONYSKO gave Jane Doe #2 a room key and informed her which motel room to use.

26. One of the other girls gave Jane Doe #2 a ride to a nearby motel. Jane Doe #2's client showed up and paid her for having sexual intercourse with him. After the appointment, Jane Doe #2 returned to Tattersal and gave all the money she made to MACK. Jane Doe #2 said MACK did not give any of it to her. Jane Doe #2 was extremely upset and asked ONYSKO if MACK was going to continue to make her do this. ONYSKO replied she could not speak for MACK.

27. Jane Doe #2 saw another client at noon that same day and was paid by him for sexual intercourse. Jane Doe #2 called ONYSKO from the motel phone to come get her and ONYSKO told Jane Doe #2 she had another client on the way. Jane Doe #2 saw her third client that day and was paid by him for sexual intercourse. Before Jane Doe #2 could call ONYSKO to pick her up, a fourth client came to the door. Jane Doe #2 said she began crying and was unable to have sex with this client. ONYSKO picked up Jane Doe #2 and took her back to the Tattersal house. Upon arriving, Jane Doe #2 gave all the money she made to MACK. She said she knew she would not receive any as she owed it to him for drugs. Jane Doe #2 said MACK was angry because the client she did not have sex with was a regular client.

28. Within days, Jane Doe #2 left the Tattersal house when her parents discovered her photographs on Backpage.com.

29. During the weeks of April 22 and April 29, 2013, your Affiant conducted a review of the HP laptop seized from the Ramada Inn on April 9, 2013 by EPD. Your Affiant found copies of the ads posted on Backpage.com and Craig's List by MACK and ONYSKO. In



addition, all the photos used in the ads were located, as well as email correspondence from potential clients who responded to the ads.

30. Based upon your Affiant's training and experience, your Affiant knows that the Ramada Inn hotel chain is owned by Wyndham Worldwide, and is an international chain headquartered in Phoenix, Arizona. Your Affiant also knows that [www.backpage.com](http://www.backpage.com) is an online website that offers a forum to post advertisements in over 400 cities. These advertisements include photographs, descriptions of services and/or products, and contact information of email addresses and/or telephone numbers. Some advertisements are free and others cost a fee, depending on what is being advertised and what section the advertisements are posted in. Your Affiant knows that areas of [www.backpage.com](http://www.backpage.com), specifically the "Escorts" page under the "Adults" section is often used by pimps and prostitutes to facilitate their prostitution related activities.

31. Your Affiant searched various records indices for information regarding MACK:

- a. Public records reports accessed through Clear, a public records database that can be accessed and searched over the Internet, for Jeremy MACK show a full name of Jeremy A. MACK, date of birth xx/xx/1975, and an active address of 318 West 25<sup>th</sup> Street, Lorain, Ohio. The month and day of the date of birth has been redacted for the purposes of this affidavit.
- b. Ohio BMV records indicate that Jeremy Alan MACK has a suspended Ohio driver's license, maintains a current address of 1891 Turner Blvd., Apartment B, Elyria, Ohio and a social security account number xxx-xx-7819. The first five numbers of the social security account number have been redacted for the purposes of this affidavit.

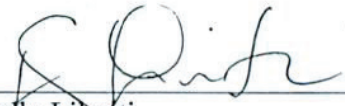
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32. Your Affiant searched various records indices for information regarding  
ONYSKO:


- a. Public records reports accessed through Clear, a public records database that can be accessed and searched over the Internet, for Ashley ONYSKO show a full name of Ashley Marie ONYSKO, a date of birth xx/xx/1990, and an active address of 32299 Lake Road, Avon Lake, Ohio. The month and day of the date of birth has been redacted for the purposes of this affidavit.
- b. Ohio BMV records indicate that Ashley Marie ONYSKO has a valid Ohio driver's license, maintains a current address of 8 Tattersall Court, Elyria, Ohio and a social security account number xxx-xx-6139. The first five numbers of the social security account number have been redacted for the purposes of this affidavit.

**CONCLUSION**

33. Based on the aforementioned factual information, your affiant respectfully submits that there is probable cause to believe that Jeremy MACK and Ashley ONYSKO have violated Title 18 U.S.C. § 1591, Sex Trafficking of Children or by Force, Fraud, or Coercion.

  
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Kelly Liberti  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed before me this 7<sup>th</sup> day of May, 2013.

  
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William H. Baughman, Jr.  
United States Magistrate Judge